

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Jaquann Greer-Johnson

Case: 2:22-mj-30381
Assigned To : Unassigned
Assign. Date : 9/8/2022
Description: CMP USA v. GREER
-JOHNSON (SO)

Case No.

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 30, 2022 though September 7, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Offense Description

Code Section

21 U.S.C. § 846, 841(a)(1), 841(b)(1)(C), and
841(b)(1)(D)

Conspiracy to distribute and to possess with intent to distribute
oxycodone and marijuana.

This criminal complaint is based on these facts:

See attached Affidavit

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 8, 2022

City and state: Detroit, MI



Complainant's signature

Special Agent Mary E. Behler, ATF

Printed name and title



Judge's signature

Hon. Jonathan J.C. Grey, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF AN CRIMINAL COMPLAINT

I, Mary E. Behler, being first duly sworn, hereby state:

INTRODUCTION AND AGENT BACKGROUND

1. I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Section 2516, Title 18, United States Code. I have been employed by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, as a Special Agent since December of 2013. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and/or participated in numerous criminal investigations involving the illegal possession, use, and sale of firearms, drug trafficking violations, and criminal street gangs.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. I submit this affidavit in support of a criminal complaint charging that, at least as early as August 30, 2022, through on or about September 7, 2022, in the Eastern District of Michigan, the defendant, JAQUANN GREER-JOHNSON, a/k/a “Quan” (B/M; DOB: XX/XX/1998), knowingly conspired and agreed with persons known and unknown, to possess with the intent to distribute and to distribute a mixture or substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(C), and 841(b)(1)(D).

PROBABLE CAUSE

August 30, 2022 Controlled Purchase

4. On August 30, 2022, at approximately 11:10 AM, ATF Special Agents (“S/As”) Totten, Jacobs, and Campbell met ATF Confidential Informant 28831¹ at a pre-determined location before a controlled purchase operation. Upon arrival, S/A Campbell and Totten conducted a search of CI-28831’s person and vehicle with no contraband being found. ATF S/As initiated

¹ CI-28831 has provided useful and reliable information in the past. CI-28831 has assisted and conducted with approximately nine (9) controlled purchases of narcotics during other federal investigations. During this investigation, payments have been made to CI-28831 by law enforcement officials for services and expenses incurred. At no time was the information provided by CI-28831 determined to be false or misleading.

surveillance around 193XX Archdale Street in Detroit, Michigan

(“ARCHDALE LOCATION”).

- a. S/A Totten provided CI-28831 with audio/video recording devices to capture the controlled purchase. S/A Totten instructed CI-28831 to purchase Percocet pills for \$270 in pre-recorded government funds from Devin King.²
- b. At approximately 11:17 AM, CI-28831 departed the staging location and proceeded toward the ARCHDALE LOCATION.
- c. At approximately 11:26 AM, CI-28831 arrived at the ARCHDALE LOCATION, exited his/her vehicle, and walked in the front door of the residence.
- d. CI-28831 informed a male, who referred to himself as “Quan,” (later identified as LAQUANN GREER-JOHNSON) that he/she was looking for percs.
- e. GREER-JOHNSON stated, “You want 10’s?” CI-28831 stated he/she wants the ones he/she paid \$20 per pill last time. GREER-JOHNSON stated he was waiting for his man to pull up with them.

² Devin King is one of GREER-JOHNSON’s conspirators, and is charged in Criminal Complaint No. 22-mj-30377. King was also present during GREER-JOHNSON’s arrest.

- f. CI-28831 asked what else he had. GREER-JOHNSON responded, “20s, 15s.” CI-28831 asked GREER-JOHNSON to fill him up.
- g. CI-28831 asked for GREER-JOHNSON’s number. GREER-JOHNSON replied that the spot is always open, and CI-28831 can just pull up whenever. GREER-JOHNSON later provided his phone number to CI-28831 and stated he goes by “Quan.”
- h. GREER-JOHNSON then started packaging the narcotics and utilizing a calculator on his cell phone.



- i. GREER-JOHNSON handed CI-28831 the suspected Percocet pills and CI-28831 departed the ARCHDALE LOCATION.

j. At approximately 11:45 AM, CI-28831 met S/A Totten, S/A Jacobs and S/A Campbell at a pre-determined location. CI-28831 provided S/A Totten with one (1) zip lock plastic baggie containing nine suspected Percocet pills. S/A Campbell conducted a search of CI-28831's person and vehicle. This concluded the controlled purchase. The laboratory results are pending.³

5. On September 2, 2022, I reviewed fixed surveillance footage of the ARCHDALE LOCATION. The following is a summary of my observations:

³ As part of the investigation, on July 20, 2022, CI-28831 purchased Percocet pills, which tested positive as Oxycodone, a Schedule II controlled substance, and marijuana, a Schedule I controlled substance, from an unknown individual at the ARCHDALE LOCATION. On July 20, 2022, an ATF undercover agent purchased mushrooms, which tested positive as psilocyn and/or psilocybin, a Schedule I controlled substance, from Devin King outside of the ARCHDALE LOCATION. On July 29, 2022, an ATF undercover agent purchased Percocet pills from Devin King outside of the ARCHDALE LOCATION, which tested positive as Oxycodone. On August 16, 2022, CI-28831 purchased Percocet pills, which tested positive as Oxycodone, from an unknown individual at the ARCHDALE LOCATION. Based on my training, experience, and review of the Percocet pills from these previous controlled purchases and the pills from August 30, 2022, the pills from August 30, 2022 look consistent with the earlier-purchased Percocet pills from the ARCHDALE LOCATION. The pills were consistent in color, but the CI ordered a different milligram from previous controlled purchases which resulted in a different marking on the pill.

- a. On September 2, 2022, at approximately 4:57 PM, I observed Devin King (wearing a black and white hat, blue jeans, and a white t-shirt) standing in the front yard of the ARCHDALE LOCATION on a cellular device. A black male wearing a black t-shirt approached the ARCHDALE LOCATION and entered through the front door. Approximately one minute later, the black male exited the ARCHDALE LOCATION and walked away from the residence. A black male with braids (later identified as GREER-JOHNSON) exited the ARCHDALE LOCATION and stood next to King. Both King and GREER-JOHNSON were on their cellular devices (Image 1a). Based on my training, experience, and knowledge about the investigation, it is my belief the black male in the black t-shirt entered the ARCHDALE LOCATION to conduct a suspected narcotics sale.



Image 1a

b. At approximately 4:59 PM, a black male wearing a blue t-shirt walked up to the residence and entered the ARCHDALE LOCATION. At approximately 5:00 PM, GREER-JOHNSON departed in a white sedan parked in the driveway and the black male in a blue t-shirt walked away from the ARCHDALE LOCATION (Image 1b). Based on my training, experience, and knowledge about the investigation, it is my belief the black male in the blue t-shirt entered the ARCHDALE LOCATION to conduct a suspected narcotics sale.



Image 1b

- c. At approximately 5:01 PM, a black male wearing a black shirt and black Adidas pants (with stripes down the sides) entered the ARCHDALE LOCATION. Shortly thereafter, King exited the ARCHDALE LOCATION. The black male wearing the Adidas pants then exited the ARCHDALE LOCATION and stood next to King. King and the unknown male appeared to look out toward the street (Image 1c). A black male wearing a black t-shirt arrived at the ARCHDALE LOCATION and entered through the front door.



Image 1c

- d. King and the black male wearing the Adidas pants walked toward the street. At approximately 5:03 PM, the black male wearing the black t-shirt (who entered the ARCHDALE LOCATION at 5:01 PM) exited the ARCHDALE LOCATION and departed the area. King walked back toward the ARCHDALE LOCATION and stood in the front yard. Based on my training, experience, and knowledge about the investigation, it is my belief the black male in the black t-shirt entered the ARCHDALE LOCATION to conduct a suspected narcotics sale.
- e. At approximately 5:04 PM, King pulled a suspected firearm out of his waistband with his right hand and brandished it directly in front of the ARCHDALE LOCATION (Image 2a, Image 2b,

Image 2c). King held a black cellphone in his left hand. King returned the suspected firearm to his waistband and a black male wearing a white t-shirt and black shorts entered the ARCHDALE LOCATION.



Image 2a



Image 2b (Zoomed In)



Image 2c

- f. The black male wearing the white t-shirt exited the ARCHDALE LOCATION and stood on the porch, appearing to talk to King. At approximately 5:06 PM, King and the black male wearing the white t-shirt entered the ARCHDALE LOCATION. Based on my training, experience, and knowledge about the investigation, it is my belief the black male in the white t-shirt entered the ARCHDALE LOCATION to conduct a suspected narcotics sale.
- g. At approximately 5:07 PM, a white mid-size Chevrolet SUV arrived at the ARCHDALE LOCATION and dropped a black male wearing a white shirt and black pants off at the curb. The white SUV then backed into the ARCHDALE LOCATION driveway. The black male entered the ARCHDALE LOCATION (Image 3a).

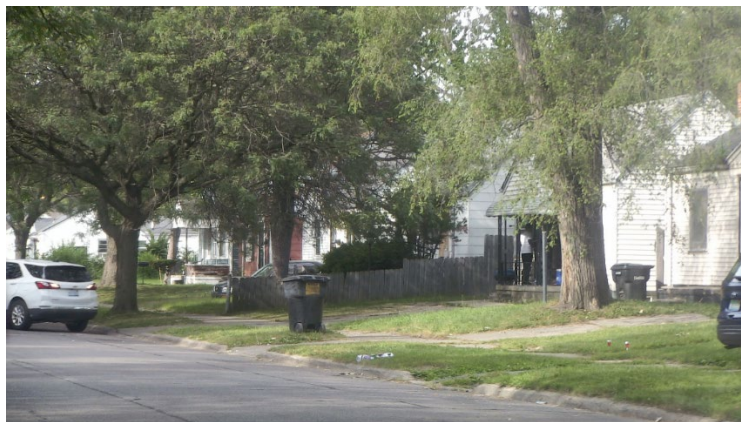


Image 3a

h. At approximately 5:08 PM, the black male wearing the white t-shirt exited the ARCHDALE LOCATION with King and the abovementioned black male wearing a white t-shirt and black shorts. The black male with the white shirt and black pants entered the white SUV and departed. King entered the ARCHDALE LOCATION. Based on my training, experience, and knowledge about the investigation, it is my belief the black male in the white SUV entered the ARCHDALE LOCATION to conduct a suspected narcotics sale.

6. I reviewed the fixed surveillance footage associated to the ARCHDALE LOCATION and observed numerous short stays, a high level of foot traffic and cars arriving and departing with a short duration. In addition, I observed King and suspected associates frequently walking in and out of the ARCHDALE LOCATION and standing in the front yard on their cellular devices. The below image was from approximately 5:23 PM when I observed numerous suspected customers at the ARCHDALE LOCATION (Image 4a). Based on my training, experience, and knowledge about the investigation, it is my belief the individuals entered the ARCHDALE LOCATION to conduct suspected narcotics sales.



Image 4a

7. On September 7, 2022, at approximately 11:11 AM, a black female wearing a pink hooded sweatshirt and gray pants arrived at the ARCHDALE LOCATION in a gray Saturn sedan. The unknown female entered the ARCHDALE LOCATION through the front door. At approximately 11:12 AM, GREER-JOHNSON and a black female wearing a pink hooded sweatshirt and gray pants exited the ARCHDALE LOCATION. Based on my training, experience, and knowledge about the investigation, it is my belief that the female entered the ARCHDALE LOCATION to conduct a suspected narcotic sale.



September 7, 2022 Search Warrant

8. On or about September 7, 2022, ATF personnel executed a federal search warrant at the ARCHDALE LOCATION. GREER-JOHNSON and Devin King were present inside the home. ATF personnel observed GREER-JOHNSON and King attempt to flee on foot. Agents observed King and GREER-JOHNSON exit the ARCHDALE LOCATION, run two houses to the north toward a red house and travel up the driveway to the backyard. The below screenshot from fixed surveillance footage depicts King clutching his waistband and fleeing the front door of the ARCHDALE LOCATION upon ATF's arrival on scene.



- a. King and GREER-JOHNSON were both detained on Harlow Street between two houses, approximately one (1) block east of the ARCHDALE LOCATION, by ATF Task Force Officer Eaton. ATF canine S/A Cicerone conducted a canine track. The canine track began where King's hat was recovered, the driveway of the red residence, located two (2) houses to the north of the ARCHDALE LOCATION (193XX Archdale, Detroit). The canine showed a strong change in behavior at the fence in the backyard and down a tree. Upon further

examination, agents recovered One (1) Glock, Model 19Gen5, 9mm caliber pistol bearing serial number BHTR298. The firearm was loaded with sixteen rounds of ammunition and was in a black holster.



- b. Agents also located one (1) Glock, Model 29 Gen 4, 10mm caliber pistol, bearing serial number BWKB817, loaded with sixteen rounds of ammunition, over the fence on the north side of the backyard.



9. During a search of the ARCHDALE LOCATION, inside the first floor living room, agents recovered suspected Percocet pills and marijuana, packaged for sale. In addition, agents recovered drug paraphernalia, including, but not limited to, scales, plastic baggies, numerous cellular devices, and security cameras.



GREER-JOHNSON's Criminal History

10. On September 7, 2022, I reviewed GREER-JOHNSON's Computerized Criminal History ("CCH"), which showed that he has the following felony conviction:

- a. On or about November 18, 2015, GREER-JOHNSON pled guilty to felony controlled substance – delivery/manufacture marijuana in Third Circuit Court.

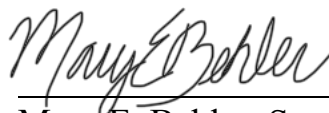
2. On September 7, 2022, I contacted ATF Interstate Nexus Expert Special Agent Lewis Rohrer who conducted a physical examination of the abovementioned Glock pistols. Based upon the physical examination,

Special Agent Rohrer advised the firearms are firearms as defined under 18 U.S.C. § 921 and were manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

CONCLUSION

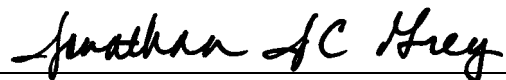
11. Based upon the aforementioned facts stated herein, there is probable cause to believe that, at least as early as August 30, 2022, through on or about September 7, 2022, in the Eastern District of Michigan, the defendant, JAQUANN GREER-JOHNSON, a/k/a “Quan” (B/M; DOB: XX/XX/1998), knowingly conspired and agreed with persons known and unknown, to possess with the intent to distribute and to distribute a mixture or substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(C), and 841(b)(1)(D).

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Mary E. Behler", written in black ink.

Mary E. Behler, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means.

A handwritten signature in cursive script, appearing to read "Jonathan J.C. Grey", written in black ink.

Honorable Jonathan J.C. Grey
United States Magistrate Judge

Dated: September 8, 2022